



Signed and Filed: March 24, 2021

DENNIS MONTALI
U.S. Bankruptcy Judge

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION (I) ENLARGING
TIME FOR SARAH PAZDAN TO
FILE PROOFS OF CLAIM;
(II) MODIFYING PLAN
INJUNCTION; (III) RESOLVING
MOTION FOR RELIEF FROM
THE AUTOMATIC STAY AND
ABSTENTION PURSUANT TO 28
U.S.C. § 1334(c)(1); AND (IV)
GRANTING RELATED RELIEF**

1 The Court having considered the *Stipulation (i) Enlarging Time for Sarah Pazdan fo File*
2 *Proofs of Claim; (ii) Modifying Plan Injunction; (iii) Resolving Motion for Relief from the*
3 *Automatic Stay and Abstention Pursuant to 28 U.S.C. § 1334(C)(1); and (iv) Granting Related*
4 *Relief*, dated March 19, 2021 [Dkt. No. 10439] (the “**Stipulation**”),¹ entered into PG&E
5 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
6 reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan, the
7 “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one
8 hand, and Sarah Pazdan (“**Pazdan**”), on the other hand, by and through their respective counsel,;
9 and pursuant to such Stipulation and agreement of the Parties, and good cause appearing,

10 IT IS HEREBY ORDERED THAT:

- 11 1. The Stipulation is approved.
- 12 2. The Pazdan Proofs of Claim are deemed timely filed.
- 13 3. The Plan Injunction is modified solely to permit Pazdan to liquidate the Pazdan
14 Proofs of Claim by filing a revised version of the Original Proposed Complaint (the “**Amended**
15 **Proposed Complaint**”), attached to the Stipulation as Exhibit A, in order to initiate the Superior
16 Court Lawsuit, and by prosecuting the Superior Court Lawsuit against the Reorganized Debtors
17 through final judgment and any appeals thereof, but not to permit enforcement of any such
18 judgment, which judgment, if any, shall be recoverable solely as a General Unsecured Claim in
19 accordance with the Plan and through the claims reconciliation process in these Chapter 11 Cases.
- 20 4. Pazdan shall not sue any individual employees or former employees (including but
21 not limited to the three employees identified in the Original Proposed Complaint) of either the
22 Reorganized Debtors or any affiliated corporate defendant, in the Superior Court Lawsuit or in
23 any other action or proceeding, on any of the claims alleged in the Superior Court Lawsuit, the
24 Original Proposed Complaint, the Amended Proposed Complaint, the Pazdan Proofs of Claim, or
25 on any other claims based on or arising from the same or materially the same common nucleus of

26
27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

1 facts, events, and circumstances alleged in the Superior Court Lawsuit, the Original Proposed
2 Complaint, the Amended Proposed Complaint, or the Pazdan Proofs of Claim.

3 5. Nothing herein shall be construed to be:

4 a. a waiver by the Debtors or the Reorganized Debtors, as applicable, or any other
5 party in interest of any right to object to the Pazdan Proofs of Claim on any
6 grounds other than the untimely filing thereof, or

7 b. a waiver by any party of any claim or defense in the Superior Court Action other
8 than as provided in paragraph 4 above.

9 6. By entry of this Order, the Motion is deemed withdrawn with prejudice.

10 7. The Stipulation is binding on the Parties and each of their successors in interest.

11 8. The Stipulation constitutes the entire agreement and understanding of the Parties
12 relating to the subject matter thereof and supersedes all prior agreements and understandings relating
13 to the subject matter thereof.

14 9. This Court shall retain jurisdiction to resolve any disputes or controversies arising
15 from the Stipulation or this Order.

16 *** END OF ORDER ***

17
18 Dated: March 19, 2021

19 KELLER BENVENUTTI KIM LLP

20 /s/ Peter J. Benvenutti

21 Peter J. Benvenutti
22 Attorneys for Debtors and
Reorganized Debtors

Dated: March 8, 2021

FARMER & READY

23 /s/ Paul F. Ready

24 Paul F. Ready
Attorneys for Sarah Pazdan

25 Dated: March 15, 2021

26 ERNST LAW GROUP

27 /s/ Taylor Ernst

28 Taylor Ernst
Attorneys for Sarah Pazdan